

FILED
2006 SEP 15 PM 1:39
U.S. DISTRICT COURT - SAN FRANCISCO
CLERK'S OFFICE

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA, }
14 Plaintiff, } No. 3-06-70252 JL
15 v. }
16 TEDDY CARL FREJ, }
17 Defendant. }

UNITED STATES MOTION AND
STIPULATION AND
PROPOSED ORDER CONTINUING
THE STATUS DATE

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19 The parties stipulate and agree that the Court hearing set for September 15, 2006 should
20 be continued to October 27, 2006 so that the parties can continue discovery and investigation.
21 The parties further stipulate and agree that the ends of justice are served by the Court granting a
22 continuance from September 15, 2006 to October 27, 2006, so that the discovery can be reviewed
23 and investigations completed. The parties ask that the Court find that this interest of justice
24 outweighs the interest of the public and the defendants in a speedy trial and an indictment or
25 information filed within 30 days of the defendant's arrest, in accordance with Title 18, § 3161(b)
26 and (h)(8)(A), and the defendant consents to have a preliminary hearing more than 20 days from
27 the date of his arrest pursuant to Title 18 U.S.C. §3060(c) and Federal Rule of Criminal Procedure
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STIP. AND [PROPOSED] ORDER
CASE NO. 3-06-70252 JL

1 5.

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3 DATED: September 14, 2006.

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Respectfully submitted,

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KEVIN V. RYAN (CASBN 118321)
6 United States Attorney

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/s/
9 C. DAVID HALL
Assistant United States Attorney

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/s/
13 PHILLIP VAUGHNS
Attorney for Mr. Frej

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STIP. AND [PROPOSED] ORDER
CASE NO. 3-06-70252 JL

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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UNITED STATES OF AMERICA, } No. 3-06-70252 JL

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Plaintiff,

12

v.

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TEDDY CARL FREJ,

14

Defendant.

} (PROPOSED) ORDER

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GOOD CAUSE APPEARING, the Court finds that:

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1. So that the parties may complete discovery and investigation, the ends of justice
served by the granting of this continuance outweighs the interest of the public and the defendant
in a speedy trial and an indictment or information filed within 30 days of the defendant's arrest,
in accordance with 18 U.S.C. §3161(b) and (h)(8)(A).

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2. The defendant consents to his preliminary hearing being held longer than 20 days after
his arrest pursuant to 18 U.S.C. §3060(c) and Federal Rule of Criminal Procedure 5.

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3. IT IS THEREFORE ORDERED that the status conference be continued to October
27, 2006, in order to allow the defendant sufficient time to review the discovery material and
complete their investigation, and the period of this continuance shall be excluded for the

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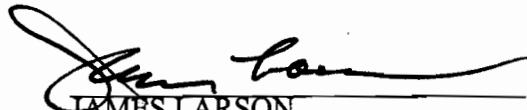
STIP. AND [PROPOSED] ORDER
CASE NO. 3-06-70252 JL

1 purposes of computing the time within an Indictment must be filed or a preliminary hearing held.

2 SO ORDERED.

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4 DATED: 8-15-06



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6 JAMES LARSON
United States Magistrate Judge

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STIP. AND [PROPOSED] ORDER
CASE NO. 3-06-70252 JL